

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of)

Advanced Television Systems)

and Their Impact Upon the)

Exisiting Television Broadcast)
Service)

MM Docket 87-268

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REPLY COMMENTS TO SIXTH FURTHER NOTICE
OF PROPOSED RULE MAKING

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

My name is Karen A. Pharis and my husband, Bill, and I own and operate nine Low Power/Translator television stations in the Fort Smith-Fayetteville-Rogers-Springdale, Arkansas Designated Market Area (DMA). Our tenth station is expected to be on the air late this year. Eight of the stations (map enclosed) are affiliated with Fox Broadcasting Company and two are affiliated with the United Paramount Network (UPN). We have invested heavily in quality programs and the latest technology so that we deliver a service that matches or exceeds that of any full power station in the market. In 1991, KPBI-LP was honored at the Fox convention as the "Fastest Growing Fox Affiliate" sign-on-to-sign off.

Ever since we signed on our first LPTV station in 1989, we realized that it would take additional channels to serve the 100-mile wide and 175-mile deep viewing area we cover here in western Arkansas and eastern Oklahoma. In succeeding LPTV filing windows and by buying unused construction permits, we have built a mini-network that competes very favorably with the three other network affiliates in our market. We broadcast two hours each weekday of live, local programming: a half-hour morning show; a one-hour sports call-in show; and a half-hour 9 p.m. local newscast with anchors in both Fort Smith and Fayetteville. We also utilize our own KU satellite uplink truck to bring news and sports to our viewers.

While we have understood from the beginning that HDTV could force channel changes or even in an extreme case, the elimination of one of our channels, we were stunned by the potential devastation the Sixth Further Notice or Proposed Rulemaking would have on our broadcast service. Of our 10 channels, Channels 46, 32, 50, 15, and 14 would appear to be eliminated because they have been assigned to stations in or adjacent to our market. Channels 60, 63, and 69 would be eliminated and the channels sold, with Channel 59 eliminated as well at a later date. Only channel 36 might be spared.

The chances of moving to other channels is going to be all but impossible under the current proposal because of the

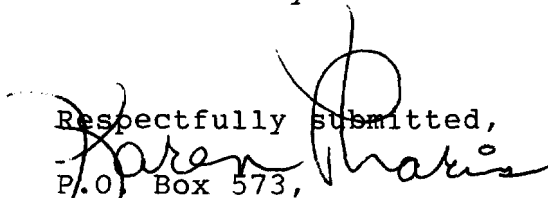
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elimination of channels 2-6, and 52-69. In addition to urging the Commission to give serious consideration to the alternatives suggested by the Community Broadcasters Association (involving more realistic interference standards and increased power to cover a greater area with fewer stations), we request that LPTV broadcasters who have demonstrated significant local programming and viewership be assigned an HDTV channel (preferably high power) with a power level strong enough to cover its current LPTV and translator service area.

We are thankful for the many kind references to the LPTV service that were made in the Sixth Further Notice. I recall a time several years ago when the manager of a cable system told us that since our stations were considered secondary, "in the eyes of the FCC, you don't exist!" That manager a short time later added KPBI-LP to his system, and we have come a long way since then, thanks to the encouragement of the Commission. Please don't do an about-face and tell us "in the eyes of the FCC, you don't exist!"

Respectfully submitted,

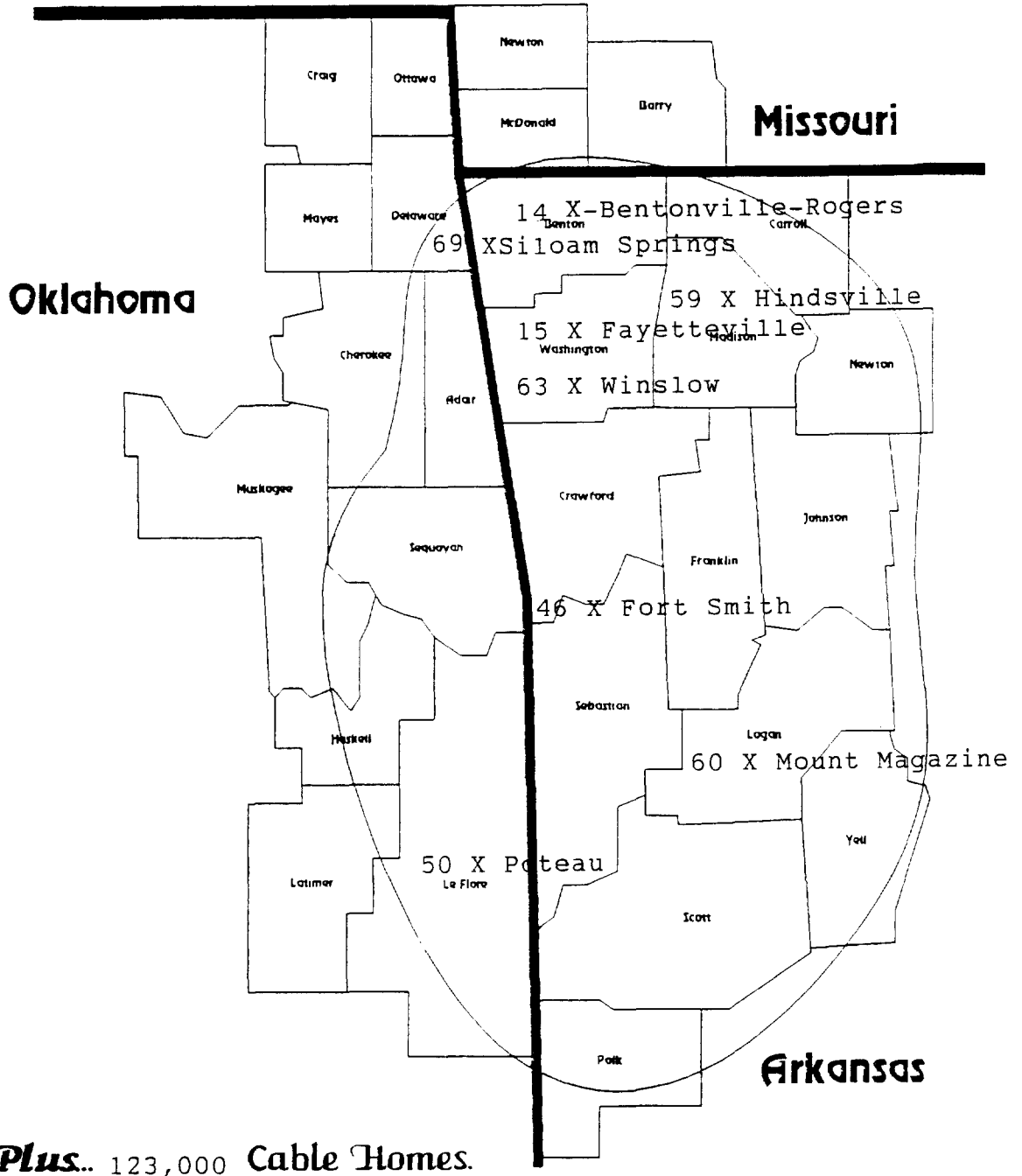

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FOX 46/15 Area Coverage Map

Kansas



Plus.. 123,000 Cable Homes.

KPBI-FOX 46